

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the  
Northern District of New York

U.S. DISTRICT COURT – N.D. OF N.Y.

UNITED STATES OF AMERICA

v.

JACOB BOLDT

Case No. 1:23-MJ- 659 (DJS)

Defendant

CRIMINAL COMPLAINT

FILED

Nov 08 - 2023

John M. Domurad, Clerk

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

From on or about April 25, 2023 to October 17, 2023 in the county of Warren in the Northern District of New York the defendant violated:

*Code Section*

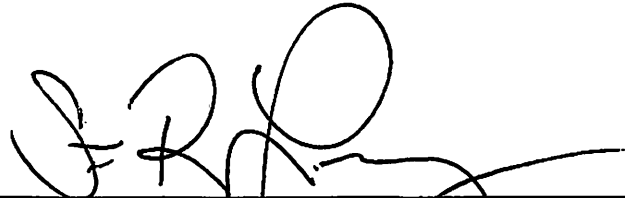
18 U.S.C. § 922(a)(1)(A)

*Offense Description*

Engaging in the Firearms Business without a License

This criminal complaint is based on these facts:  
See attached affidavit

☒ Continued on the attached sheet.



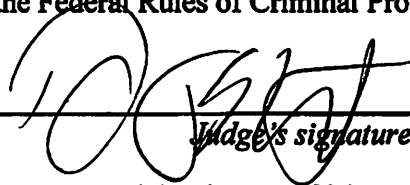
*Complainant's signature*

Steven Lansing, Special Agent

*Printed name and title*

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: November 8, 2023



*Judge's signature*

City and State: Albany, NY

Hon. Daniel J. Stewart, U.S. Magistrate Judge

*Printed name and title*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK**

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Steven Lansing, being duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of a criminal complaint charging JACOB BOLDT (“BOLDT”) with possessing a firearm as a convicted felon, in violation of 18 U.S.C. §922(g)(1).

2. I am a Special Agent with the U.S. Immigration and Customs Enforcement Office of Homeland Security Investigations (“HSI”) and have been since August 2020. As such, I am an investigative or law enforcement officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18, United States code, Section 2516(1). I have been a law enforcement officer for 8 years. I was a police officer for approximately 5 years and have been a Special Agent for 3 years. Prior to becoming a Special Agent, I was a police officer in the state of New York from 2016 until 2020.

3. My current duties include investigating a wide variety of federal criminal violations, including firearms-related offenses.

4. The facts in this affidavit come from my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested criminal complaint and does not set forth all of my knowledge about this matter.

**THE STATUTE**

5. Under Section 922(a)(1)(A), “it shall be unlawful for any person except a licensed importer, licensed manufacturer, or licensed dealer, to engage in the business of importing, manufacturing, or dealing in firearms.”

- a. “The term ‘firearm’ means (A) any weapon (including a starter gun) which will or is designed to or may readily be converted to expel a projectile by the action of an explosive; (B) the frame or receiver of any such weapon; [or] (C) any firearm muffler or firearm silencer[.]” 18 U.S.C. §921(a)(3).
- b. “The term ‘manufacturer’ means any person engaged in the business of manufacturing firearms or ammunition for purposes of sale or distribution.” 18 U.S.C. §921(a)(10). A manufacturer is “engaged in the business” of firearms when he “devotes time, attention, and labor to manufacturing firearms as a regular course of trade or business with the principal objective of livelihood and profit through the sale or distribution of the firearms manufactured.” 18 U.S.C. §921(a)(21)(A).
- c. “The term ‘dealer’ means (A) any person engaged in the business of selling firearms at wholesale or retail, [or] (B) any person engaged in the business of repairing firearms or of making or fitting special barrels, stocks, or trigger mechanisms to firearms[.]” 18 U.S.C. §921(a)(11). A dealer is “engaged in the business” of firearms when he “devotes time, attention, and labor to dealing in firearms as a regular course of trade or business to predominantly earn a profit through the repetitive purchase and resale of firearms.” 18 U.S.C. §921(a)(21)(C). However, this does “not include a

person who makes occasional sales, exchanges, or purchases of firearms for the enhancement of a personal collection or for a hobby, or who sells all or part of his personal collection of firearms.” *Id.*

**PROBABLE CAUSE**

6. The Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”) keeps records of every individual who is licensed to import, manufacture, or deal firearms. BOLDT is not licensed to import, manufacture, or deal firearms.

7. The Saratoga County Court convicted BOLDT of Attempted Burglary in the Third Degree, a class E felony, on November 18, 2013. Boldt may not lawfully possess a firearm. *See* 18 U.S.C. §922(g)(1).

**A. BOLDT Engages in Substantial Facebook Messenger Discussions to buy Privately Manufactured Firearms for Resale**

8. On September 18, 2023, the Honorable Daniel J. Stewart issued a search warrant directing Meta to produce certain records, including communications, from a Facebook Account-

1. The records Meta produced in response to that search warrant confirmed that Individual-1 is the user of Facebook Account-1.

9. BOLDT used Facebook account “Jacob Boldt” (“Boldt’s Account”) to engage in substantial conversations with Individual-1 via Facebook Account-1 about the purchase of privately-manufactured firearms—also known as ghost guns—for resale.

10. JACOB BOLDT is the user of Boldt’s Account. I have reviewed the public portions of Boldt’s Account, and the profile picture features a person I recognize to be JACOB BOLDT. Furthermore, in a Facebook message sent to Individual-1 on September 9, 2023, a person using the Facebook account titled Boldt’s Account said that his address was on James Court in Gansevoort, New York. On August 6, 2023, Boldt was arrested in Queensbury, New York and

provided law enforcement with an address of the same street number on James Court but with the letter A after the number in Northumberland, New York.<sup>1</sup>

11. With respect to Boldt's Account, the Meta records from the search warrant of Facebook Account-1 reflect that:

- a. On April 25, 2023, BOLDT wrote to Individual-1, "I need one of your 3d heaters ASAP do you need the money up front before you make it or do you gone one already made I can but"? The user of Boldt's Account then followed up with "Buy\*\*" and Individual-1 responded "I got you" and "Glock 9mm fn40. Cal what u looking for"? Based on my training, experience, and knowledge of the investigation, I believe that "3d heaters" means a 3D printed gun.
- b. On May 14, 2023, BOLDT sent Individual-1 a picture of a shotgun with the message "Just bought this from this boster addict I know, hel steal anything not bolted down n sell it for rock lol literally showed up at 145 am n I gave him \$120 for it lol." Based on my training, experience, and knowledge of the investigation, I believe this exchange shows that Boldt purchased a shotgun from a drug user.
- c. On Sunday, July 23, 2023, BOLDT wrote to Individual-1 "After I buy that from you Tuesday I'm ordering everything I need to start printing n building my own,I want you to show me up how to do it,I got so many criminal connections that want exactly what you made me." BOLDT later wrote "Yes ghost ones should cost more and I plan on charging more then a legal one" and "Ppl who

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<sup>1</sup> The hamlet of Gansevoort is in the town of Northumberland.

want a ghost gun want it for the fact their untraceable which in my mind is going to cost you more.n most ppl that want them can't buy one legally so their guna cost more." (Emphasis added). Based on my training, experience, and knowledge of the investigation, I believe that these messages indicate that BOLDT wanted to manufacture 3D printed firearms and sell them to "criminal connections."

- d. On August 1, 2023, BOLDT messaged Individual-1 "N my buddy is waiting for me to bring him out to get one I told him he had to place an order ahead of time n he's 100 gunna buy one,so even if i can't take it he will,but he don't want a suppressor on it.n I am n have been serious fucker just wasn't expecting a different one to basically fall into my lap for cheap lol.what's lowest you can do for that one with no suppressor n no extras? Cus if you're u come down enough i I can give you a chunk towards the AR I want." Based on my training, experience, and knowledge of the investigation, I believe that these messages indicate that BOLDT has a purchaser for a firearm and wants to pay money towards an AR that Individual-1 was building.
- e. On August 6, 2023, BOLDT wrote "Well get building me that 7.62 AR" and "I still need two plan Jane ones,one for my old boss and one for his workers,the money for them is already waiting." Based on my training, experience, and knowledge of the investigation, I believe that this message indicate that BOLDT wanted to purchase firearms from Individual-1 to sell to his "old boss" and the old boss's "workers."

- f. On August 19, 2023, BOLDT sent Individual-1 a message asking “So we trading straight up the AR for the one I left with you correct? They were talking about the gun the other night n the kids mom said it was a \$1200 piece he won in some giveaway from some website he bought parts from so he wasn’t too upset it coming up missing.” Based on my training, experience, and knowledge of the investigation, I believe that BOLDT is describing a stolen gun.
- g. On September 9, 2023, BOLDT sent a message to Individual-1 saying “Ight, that pistol you got made, make it as plain as possible w regular mag no sight or muzzle break n on the blue lower cus I’m selling it to someone else n I still want you to have all the cool parts to build mine with lol.” Based on my training, experience, and knowledge of the investigation, I believe that BOLDT is giving Individual-1 instructions on manufacturing a firearm that BOLDT will re-sell.

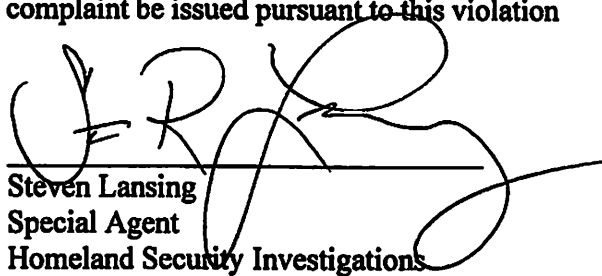
**B. BOLDT Sells a Firearm to Individual-2**

- 12. On October 17, 2023, law enforcement officers observed Individual-2 go to BOLDT’s address on James Court in Gansevoort, New York.
- 13. I have reviewed video of the interaction between Individual-2 and BOLDT. That video reflects that BOLDT provided Individual-2 with a 3D printed Blackout 300 rifle in exchange for money.
- 14. Law enforcement recovered the 300 Blackout rifle from Individual-2 within five minutes of leaving the location.

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**CONCLUSION**

15. Based on the forgoing, I believe there is probable cause to establish that JACOB BOLDT has violated 18 U.S.C. §922(a)(1)(A) by engaging in the business of dealing firearms without a license. I therefore request that a criminal complaint be issued pursuant to this violation of federal law.



Steven Lansing  
Special Agent  
Homeland Security Investigations

I, the Honorable Daniel J. Stewart, United States Magistrate Judge, hereby acknowledge that this affidavit was attested to by the affiant by telephone on November 8, 2023, in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.



Hon. Daniel J. Stewart  
United States Magistrate Judge